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6 *Attorneys for Defendant American Borate Company*

7
UNITED STATES DISTRICT COURT
 8
DISTRICT OF NEVADA

9 HILLCREST INVESTMENTS, LTD., a
 10 foreign corporation,

11 Plaintiff,

12 vs.

13 AMERICAN BORATE COMPANY, a
 California General Partnership,

14 Defendant.

Case No.: 2:15-cv-01613-RFB-GWF

**STIPULATION TO EXTEND BRIEFING
 DEADLINES REGARDING PLAINTIFF'S
 MOTION FOR LEAVE TO AMEND**

(FIRST REQUEST)

16 Plaintiff Hillcrest Investments, Ltd ("Hillcrest") and Defendant American Borate Company
 17 ("American Borate"), by and through their undersigned counsel of record, do hereby stipulate and
 18 agree that the deadlines for briefing on Hillcrest's Motion for Leave to Amend (the "Motion") shall
 19 be extended as follows: (1) American Borate's filing of a Response to the Motion shall be extended
 20 from April 1, 2016 to April 11, 2016; and (2) Hillcrest's filing of a Reply in support of its Motion
 21 shall be extended from April 8, 2016 to April 20, 2016. The parties have agreed upon this extension
 22 because Hillcrest's Motion raises new legal issues and attaches new legal documents that require
 23 American Borate to investigate them before properly responding. American Borate cannot complete
 24 this investigation before the current deadline of April 1, 2016.
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1 Pursuant to LR 6-1(b), good cause exists to grant the stipulation and there have been no
2 previous requests asking for an extended briefing deadline regarding the Motion.

3 Dated: March 31st, 2016

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5 LIZADA LAW FIRM, LTD.

McDONALD CARANO WILSON LLP

6 /s/ Angela L. Lizada

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11 *Attorneys for Plaintiff Hillcrest
Investments, Ltd*

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13 *Attorneys for Defendant American Borate
Company*

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17 IT IS SO ORDERED:

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RICHARD F. BOULWARE, II
United States District Judge

DATED: April 4, 2016.